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20 THE BANK OF NEW YORK MELLON
21 CORPORATION
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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
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16 *In re BANK OF NEW YORK MELLON*
17 *CORPORATION FALSE CLAIMS ACT*
18 *FOREIGN EXCHANGE LITIGATION, Ex rel.*
19 *FX ANALYTICS,*

No. 3:11-cv-05683-JCS

20 Plaintiff,
21 v.
22 THE BANK OF NEW YORK MELLON
23 CORPORATION, and DOES 1 through 100,
24 inclusive,
25 Defendants.
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STIPULATION EXTENDING TIME TO
RESPOND TO SECOND AMENDED
COMPLAINT

1 Pursuant to Civil Local Rule 6-1(a), the undersigned parties hereby stipulate and
2 agree to extend the time within which Defendant may plead, move or otherwise respond to the
3 Second Amended Complaint as follows:

4 1. On or before December 27, 2011, the Plaintiff/Relator and the Intervenors
5 (collectively, "Plaintiffs") may: (1) move to remand this action to state court in whole or in part,
6 (2) file a further amended complaint(s), or (3) take none of these actions.

7 2. If Plaintiffs neither move to remand nor file a further amended complaint,
8 Defendant shall have until January 23, 2012 to plead, move or otherwise respond to the Second
9 Amended Complaint currently on file in this action.

10 3. If Plaintiffs move to remand, Defendant shall have until January 23, 2012
11 to oppose such motion.

12 4. If a motion to remand is made and denied, Plaintiffs may amend the
13 present complaint within 15 days of the Court's ruling denying the motion to remand. If no
14 Plaintiff elects to amend, Defendant shall plead, move, or otherwise respond to the Second
15 Amended Complaint currently on file within 45 days of the Court's ruling denying the motion to
16 remand.

17 5. If any Plaintiff files an amended complaint rather than seeking remand,
18 Defendant shall have 30 days from the filing and service of such amended complaint in which to
19 plead, move or otherwise respond to it. The briefing schedule on any such motion shall be in
20 accordance with the Local Civil Rules for the Northern District of California.

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22 Dated: December 13, 2011

BINGHAM McCUTCHEN LLP

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By: /s/ David M. Balabanian

25 David M. Balabanian (SBN 37368)
Attorneys for Defendant The Bank of
New York Mellon Corporation

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1 Dated: December 13, 2011

LIEEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

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3 By: /s/ Lexi Hazam
Lexi Hazam (SBN 224457)
4 Attorneys for Plaintiff/Relator FX Analytics

5 Dated: December 13, 2011

COTCHETT, PITRE & McCARTHY, LLP

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7 By: /s/ Steven N. Williams
Steven N. Williams (SBN 175849)
8 Attorneys for Intervenors Los Angeles County
9 Employees Retirement Agency, San Diego
County Employee Retirement Association, Los
Angeles Department of Water and Power
Retirement Plan, and Stanislaus County
10 Employees Retirement Agency

11 Dated: Dec. 14, 2011

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